

Richard C. Gordon, Esq.
Nevada Bar No. 9036
David E. Edelblute, Esq.
Nevada Bar No. 14049
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
Telephone: 702.784.5200
Facsimile: 702.784.5252
rgordon@swlaw.com
dedelblute@swlaw.com

*Attorneys for Defendant OEM Tech Bargains, LLC,
operating under the tradenames CamKix and Eco-
Fused*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WINNER'S SUN PLASTIC & ELECTRONIC
(SHENZHEN) CO. LTD., a Chines Limited
Company,

Plaintiff,

vs.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "B",

Defendants.

Case No.: 2:19-cv-00980-RFB-DJA

**STIPULATION AND ORDER TO SET
ASIDE FINAL DEFAULT
JUDGMENT**

Plaintiff Winner's Sun Plastic & Electronic (Shenzhen) Co., Ltd ("Plaintiff") and Defendant OEM Tech Bargains, LLC, operating under the tradenames CamKix and Eco-Fused ("Defendant" or "CamKix"), hereby submits the following stipulation to set aside the Final Default Judgment entered against CamKix only [ECF No. 45]:

1. Plaintiff filed this action on June 9, 2019. [ECF No. 1].
2. Plaintiff filed an *Ex Parte* Motion for Alternative Service on August 13, 2019. [ECF No. 7].
3. The Court granted Plaintiff's *Ex Parte* Motion for Alternative Service on August 14, 2019. [ECF No. 8].

1 4. Plaintiff filed a Declaration of Service on January 28, 2020, where, Plaintiff stated
2 that, pursuant to the Court's Order Granting Alternative Service [ECF No. 7], CamKix was
3 electronically served with the Summons and Complaint on or about January 23, 2020. [ECF No.
4 27].

5 5. Plaintiff filed a Motion for Entry of Clerk's Default against CamKix (among others)
6 on February 19, 2020 [ECF No. 32], which the Clerk entered on February 21, 2020. [ECF No. 36].

7 6. Plaintiff filed a Motion for Default Judgment against CamKix (among others) on
8 November 9, 2020 [ECF No. 41], which the Court granted on September 30, 2020. [ECF No. 42].

9 7. The Court entered the Final Default Judgment against CamKix (among others) on
10 November 15, 2021 ("Final Default Judgment"). [ECF No. 45].

11 8. After discussions between counsel, the Parties stipulate and agree to set aside the
12 Final Default Judgement (as entered against CamKix only) so that this matter may proceed against
13 CamKix on the merits.

14
15 / / /

16 / / /

17 / / /

18 / / /

19 / / /

20 / / /

21 / / /

22 / / /

23 / / /

24 / / /

25 / / /

26 / / /

27 / / /

28 ///

9. The Parties agree that CamKix shall respond to Plaintiff's Complaint within 30 days after the order setting aside the Default Judgment as to CamKix has been entered.

Dated: December 21, 2021

Dated: December 21, 2021

SNELL & WILMER L.L.P.

BAYRAMOGLU LAW OFFICES LLC

By: /s/ Richard C. Gordon, Esq.

By: /s/ Nihat Deniz Bayramoglu, Esq.

Richard C. Gordon, Esq.
David E. Edelblute, Esq.
3883 Howard Hughes Parkway, Ste. 1100
Las Vegas, Nevada 89169

Nihat Deniz Bayramoglu, Esq.
1540 West Warm Springs Rd., Ste. 100
Las Vegas, Nevada 89014

Attorney for Plaintiff

*Attorneys for OEM Tech Bargains, LLC
dba CamKix*

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE

DATED: December 22, 2021

4858-0787-4055.1